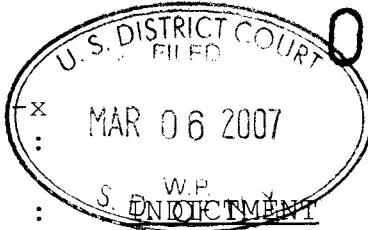


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -
MARK McGLYNN,

Defendant.



: 07 Cr

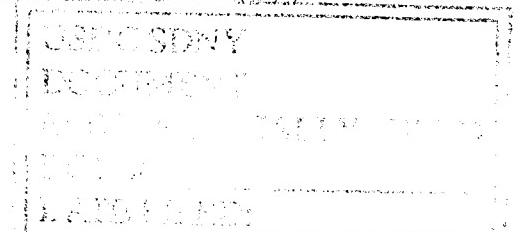
07 CRIM. 0172

COUNT ONE

The Grand Jury charges:

From on or about February 8, 2007 through on or about March 2, 2007, in the Southern District of New York and elsewhere, MARK McGLYNN, the defendant, using facilities and means of interstate and foreign commerce, unlawfully, willfully, and knowingly attempted to persuade, induce, and entice an individual who had not attained the age of 18 years to engage in a sexual activity for which a person can be charged with a criminal offense, to wit: the defendant commenced and carried on an instant-messaging exchange over the Internet with an individual whom he believed was a 15 year old girl (but who in fact was an undercover police officer), invited that person to meet him at a motel in Westchester County, New York for the purpose of having sexual intercourse there, made arrangements to meet that person at the said motel, and thereafter drove from Pennsylvania to the said motel and registered there at the pre-arranged time and date.

(Title 18, United States Code, Section 2422(b).)



COUNT TWO

The Grand Jury charges:

On or about March 2, 2007, in the Southern District of New York and elsewhere, MARK McGLYNN, the defendant, unlawfully, willfully, and knowingly traveled in interstate commerce, for the purpose of engaging in illicit sexual conduct with another person, to wit: the defendant commenced and carried on an instant-messaging exchange over the Internet with an individual whom he believed was a 15 year old girl (but who in fact was an undercover police officer), invited that person to meet him at a motel in Westchester County, New York for the purpose of having sexual intercourse there, made arrangements to meet that person at the said motel, and thereafter drove from Pennsylvania to the said motel and registered there at the pre-arranged time and date.

(Title 18, United States Code, Section 2423(b))

Michael J. Garcia
FOREPERSON

Michael J. Garcia
Michael J. Garcia
United States Attorney